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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

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| IRMA CASILLAS DE MAGANA, |) | Case No. 1:21-cv-01288-BAK (EPG) |
| |) | |
| Plaintiff, |) | STIPULATION AND ORDER FOR |
| |) | EXTENSION OF TIME |
| vs. |) | (ECF No. 12) |
| |) | |
| KILOLO KIJAKAZI, Acting |) | |
| Commissioner of Social Security, |) | |
| |) | |
| Defendant. |) | |
| |) | |
| |) | |
| |) | |

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from April 25, 2022 to June 24, 2022, for Plaintiff to serve on defendant with Plaintiff's Motion for Summary Judgment. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's first request for an extension of time. Good cause exists for this extension. First, Counsel for the Plaintiff underwent major orthopedic surgery on March 17, 2022, and is dealing with post-operation pain and the secondary effects of medications; and as a

1 result, is working short periods throughout the day with significant breaks throughout. Counsel
2 will also undergo 12 weeks of physical therapy, four days a week.

3 Secondly, as this Court is well aware, Social Security case filings in federal court
4 increased due to a combination of factors including an increase in appeals council decisions and
5 an increase in hearings at the administrative levels. Then, as a result of the pandemic, shelter-in-
6 place mandates, and Court ordered Stays, there were significant delays in producing transcripts.
7 In recent months, Counsel for the Plaintiff has received a greater-than-usual number of Answers
8 and Certified Administrative Records from defendant including over 56 cases in February and
9 March of 2022.

10 For the weeks of April 18, 2022 and April 25, 2022, Counsel for Plaintiff has 17 merit
11 briefs, and several letter briefs and reply briefs. For the month of May 2022, Counsel has over
12 20 merit briefs currently calendared, with that number expected to grow.

13 Lastly, another attorney with the firm, Ms. Dolly Trompeter, is currently out of state due
14 to her father's medical condition and as a result, the undersigned has taken on additional matters
15 compounding the need for an additional extension.

16 Counsel for the Plaintiff does not intend to further delay this matter. Defendant does not
17 oppose the requested extension. Counsel apologizes to the Defendant and Court for any
18 inconvenience this may cause.

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20
21 Respectfully submitted,

22 Dated: March 30, 2022 PENA & BROMBERG, ATTORNEYS AT LAW

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24 By: /s/ Jonathan Omar Pena
25 JONATHAN OMAR PENA
26 Attorneys for Plaintiff

27 Dated: March 30, 2022 PHILLIP A. TALBERT
28 United States Attorney

PETER K. THOMPSON
Acting Regional Chief Counsel, Region IX
Social Security Administration

By: */s/ Patrick Snyder
Patrick Snyder
Special Assistant United States Attorney
Attorneys for Defendant
(*As authorized by email on March 30, 2022)

ORDER

Based on the above stipulation (ECF No. 12), IT IS ORDERED that Plaintiff shall file Plaintiff's motion for summary judgment no later than June 24, 2022. All other deadlines in the Court's scheduling order are extended accordingly.

IT IS SO ORDERED.

Dated: April 4, 2022

/s/ Eric P. Grogan
UNITED STATES MAGISTRATE JUDGE